

Exhibit A

Quezada, Stephen J.

From: Quezada, Stephen J.
Sent: Monday, June 17, 2024 6:44 PM
To: Richard Alamia
Cc: ric@oxfordandgonzalez.com; Folk, Laura C.; Valle, Lorena D.; Stukenberg, William R.
Subject: Re: Case 7:23-cv-00343 Cruz et al v. Delgar Foods, LLC d/b/a Delia's Tamales

Yes, please mark us as opposed.

Stephen J. Quezada | Ogletree Deakins

One Allen Center, 500 Dallas Street, Suite 2100 | Houston, TX 77002 | Telephone: 713-655-5757
stephen.quezada@ogletree.com | www.ogletree.com | [Bio](#)
Board Certified - Labor and Employment Law - Texas Board of Legal Specialization

On Jun 17, 2024, at 8:00 AM, Richard Alamia <richard.alamia@yahoo.com> wrote:

[Caution: Email received from external source]

do you object on the motion for leave to amend? so we can put it on our certificate of conference

On Friday, June 14, 2024 at 10:50:56 AM CDT, Quezada, Stephen J. <stephen.quezada@ogletree.com> wrote:

Richard,

I want to address two things regarding your below email. First, the need for you seek leave in order to attempt to add Ms. Garza as a party. And, second, your basis for adding Ms. Garza as party.

As the deadline to add new parties has passed, you will first need to seek leave of Court and meet your burden to show that you are entitled to leave. Ms. Garza is not someone who was discovered after the lawsuit was filed during the written discovery process. Indeed, you all

disclosed Ms. Garza long ago and have stated that you would like to add her as a party since at least April. We are therefore opposed to a request for leave.

We have also made it clear that Ms. Garza has not been involved in the business since 2017, which is outside the limitations period for the claims. That means that she has not made any business decisions, including any decisions as to pay, schedules, hiring, firing, etc. in the relevant time period. If you believe you have evidence to the contrary, please let us know what this is. We are therefore opposed to adding Ms. Garza as a party.

To be clear, it is our position that adding Ms. Garza as a party is improper because it is beyond the deadline to do so and there are no facts that would give rise to a claim as to her. Adding her as a party is frivolous and intended only for purposes of harassment. Absent some good faith basis for adding her, as required by rules of pleading, we will seek sanctions.

Regards,

Stephen

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From: Richard Alamia <richard.alamia@yahoo.com>

Sent: Friday, June 14, 2024 7:37 AM

To: ric@oxfordandgonzalez.com; Folk, Laura C. <lfolk@porterhedges.com>

Cc: Valle, Lorena D. <lvalle@porterhedges.com>; Stukenberg, William R.

<wstukenberg@porterhedges.com>; Quezada, Stephen J. <stephen.quezada@ogletreedeakins.com>

Subject: Re: Case 7:23-cv-00343 Cruz et al v. Delgar Foods, LLC d/b/a Delia's Tamales

[Caution: Email received from external source]

we will be amending our pleadings and also include Delia Garza individually. Will you accept service on her behalf? And are you in agreement on amending the pleadings?

On Thursday, June 6, 2024 at 11:13:20 AM CDT, Folk, Laura C. <lfolk@porterhedges.com> wrote:

Counsel,

In connection with the captioned matter, attached are the following amended notices which indicate the change in depo location:

- Amended Notice of Deposition of Armando Morales de Llano;
- Amended Notice of Deposition of Carlos Morales;
- Amended Notice of Deposition of Elias Gutierrez;
- Amended Notice of Deposition of Luis Zuniga;
- Amended Notice of Deposition of Miguel Caballero; and
- Amended Notice of Deposition of Olga Perez.

Please confirm receipt.

Laura C. Folk | Legal Secretary for Lorena D. Valle
Porter Hedges LLP

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Web • V-Card

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